

Joel R. Glucksman, Esq. (JG 6443)
SCARINCI & HOLLENBECK, LLC
1100 Valley Brook Ave., P.O. Box 790
Lyndhurst, New Jersey 07071-0790
Tel.: 201-896-4100
E-Mail: jglucksman@sh-law.com
Attorneys for the City of Union City

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

FRANKLIN MEDINA,

Debtor.

CASE NO.: 18-11629-RG

Chapter 11

Hearing: No appearance needed

**LIMITED NOTICE OF APPEARANCE, REQUEST FOR NOTICES
AND SERVICE OF PAPERS, AND REQUEST FOR MATRIX ENTRY**

**TO: THE UNITED STATES BANKRUPTCY COURT
AND ALL INTERESTED PARTIES**

PLEASE TAKE NOTICE that the City of Union City (the "COUC"), files this limited Notice of Appearance in the above-captioned case, by and through its attorneys, Scarinci & Hollenbeck, LLC, 1100 Valley Brook Avenue, P.O. Box 790, Lyndhurst, New Jersey 07071-0790 (attention: Joel Glucksman, Esq.), pursuant to Bankruptcy Rule 9010, and requests that all notices (including those required by Bankruptcy Rule 2002) in this case or in any related adversary proceeding be mailed to the undersigned at the address set forth below.

PLEASE TAKE FURTHER NOTICE that request is hereby also made for service on the undersigned of copies of all papers (and/or electronic filings), including but not limited to reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements, and answering or reply papers filed in the above-captioned case or in any related adversary

proceeding, by mailing a copy of each, unless otherwise directed by the Court, to the individual identified hereinbelow.

PLEASE TAKE FURTHER NOTICE that the COUC requests that the following be added to the Court's Mailing Matrix and/or any master service list maintained in this case:

Joel R. Glucksman (JG 6443)
SCARINCI & HOLLENBECK, LLC
1100 Valley Brook Avenue, P.O. Box 790
Lyndhurst, New Jersey 07071-0790
jglucksman@sh-law.com

PLEASE TAKE FURTHER NOTICE that the COUC does not intend this Limited Notice of Appearance to constitute a waiver of any and all sovereign or other immunities to which the COUC is and/or may be accorded and/or entitled, and the COUC does not waive, expressly or impliedly, any and all claims of immunity as a result of filing this Limited Notice of Appearance. This Limited Notice of Appearance also should not be construed as an admission that the COUC is a party in interest, a creditor, or otherwise holds any particular relationship with Debtor, nor should it be construed as an admission of this Court's jurisdiction over the COUC. The COUC retains all rights in that respect, including the right to assert its sovereign immunity in any applicable matter.

PLEASE TAKE FURTHER NOTICE that the COUC also does not intend this Limited Notice of Appearance, nor any subsequent appearance, pleading, claim, or suit, to waive any and/or all other rights to which the COUC may be entitled including, but not limited to: (i) the right to have final orders in noncore matters entered only after de novo review by a District Court Judge; (ii) the right to trial by jury in any proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any rights, claims, actions, defenses, setoffs, or recoupments to

which the COUC is or may be entitled under agreements, in law or in equity all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

DATED: August 29, 2019

SCARINCI & HOLLENBECK, LLC
1100 Valley Brook Avenue, P.O. Box 790
Lyndhurst, New Jersey 07071-0790
Telephone: (201) 896-4100
E-Mail: jglucksman@sh-law.com
Attorneys for the City of Union City

By: /s/ Joel R. Glucksman
JOEL R. GLUCKSMAN, ESQ.